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July 26, 2022

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, N.Y. 10007

Re: United States v. Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

We write to request modification of Mr. Parnas's terms of release, to remove his electronic monitoring requirement so that he can swim and engage in other water sports with his children prior to surrendering, and to extend his surrender date to September 1, 2022, to allow him to assist his family in moving residences.

The Government does not oppose extending Mr. Parnas's surrender date, but is opposed to removal of electronic monitoring.

We believe that Mr. Parnas's strong record of compliance with the terms of his release and motivation to serve and complete his sentence without incident militate strongly in favor of removal of his monitoring requirement.

Thank you for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy
Co-counsel to Lev Parnas

cc: All Counsel